

July 25, 2002

Mr. Dan Hirsch, Director of Operations  
Dalton Corporation, Kendallville Manufacturing Facility  
200 West Ohio Street  
Kendallville, IN 46755

Re: Exempt Construction and Operating Status  
113-15818-00004

Dear Mr. Dan Hirsch:

Dalton Corporation, Kendallville Manufacturing Facility, was issued an exemption to their Part 70 Draft Permit on June 10, 2002 for the installation of two (2) natural gas afterburners with a maximum capacity of 5.0 MMBTU per hour each to be added to the existing cupola furnace to control CO emission. A letter requesting a revision to the minimum required operating temperature for the two (2) natural gas afterburners was received on July 3, 2002. This Exempt Construction and Operating Letter 113-15818-00004 supersedes the previously issued Exemption Construction and Operating Letter 113-15626-00004.

Two (2) natural gas afterburners with a maximum capacity of 5.0 MMBTU per hour each to be added to the existing cupola furnace to control CO emission.

**State Rule Applicability - Entire Source**

The following conditions shall be applicable:

- (1) Pursuant to 326 IAC 5-1-2 (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following:
  - (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
  - (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute non-overlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

**326 IAC 9-1 (Carbon Monoxide Emission Limits)**

Pursuant to 326 IAC 9-1-2, the two afterburners for CO control shall be in operation and maintain a minimum temperature of one thousand three hundred (1,300) degrees Fahrenheit for a minimum retention time of three-tenths (0.3) second and control emissions from the cupola at all times that the cupola is in operation and during startup of the cupola.

## Compliance Monitoring Requirements

### 326 IAC 2-7-6(1) (Temperature Monitoring)

The permittee shall record the operating temperature of the afterburners at least once per shift when the cupola is in operation. Unless operated under conditions for which the Preventative Maintenance Plan specifies otherwise, the afterburner temperatures shall be maintained at a minimum of 1300 degrees F for a minimum retention time of three-tenths (0.3) second. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the temperature is below the above mentioned minimum for any one reading.

This existing source has submitted their Part 70 application (T113-6491-00004) on August 30, 1996. The equipment being reviewed under this permit shall be incorporated in the submitted Part 70 application.

Any change or modification which may increase the potential PM emissions to five (5) tons per year or more, or VOC emissions to ten (10) tons per year or more, from the equipment covered in this exemption must be approved by the Office of Air Quality (OAQ) before such change may occur.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this exemption and the following revised pages to the front of the original permit.

Sincerely,

Original signed by Paul Dubenetzky

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Quality

JF

cc: File - Noble County  
Noble County Health Department  
Air Compliance Section Inspector - Dick Sekula  
Compliance Data Section - Karen Nowak  
Administrative and Development  
Technical Support and Modeling - Michele Boner  
Part 70 Application File - T113-6491-00004  
Part 70 Reviewer - Nisha Sizemore

## Indiana Department of Environmental Management Office of Air Quality

### Technical Support Document (TSD) for an Exempted Unit

#### Source Background and Description

Source Name:	Dalton Corporation, Kendallville Manufacturing Facility
Source Location:	200 West Ohio Street, Kendallville, Indiana 46755
County:	Noble
SIC Code:	3321
Operation Permit No.:	T113-6491-00004
Operating Permit Issuance Date:	still pending
Exemption No:	113-15818-00004
Permit Reviewer:	James Farrell

The Office of Air Quality (OAQ) has reviewed a revision request from Dalton Corporation, Kendallville Manufacturing Facility relating to the operation of:

Two (2) natural gas afterburners with a maximum capacity of 5.0 MMBTU per hour each to be added to the existing cupola furnace to control CO emission.

#### History

On June 10, 2002, Dalton Corporation - Kendallville Manufacturing Facility received an Exemption Letter 113-15626-00004 from the OAQ for adding two (2) natural gas afterburners to the existing cupola furnace to control CO emission. On July 3, 2002 the OAQ received a letter from Dalton Corporation for a revision to the minimum required operating temperature of the two natural gas afterburners from 1400 degrees F to 1300 Degrees F. Based on the applicability of 326 IAC 9-1(Carbon Monoxide Emission Limits) the OAQ is revising the TSD for Exemption Letter 113-15626-00004 as follows with the changes indicated with new language underlined and bolded with old language as strikeout. Please attach the revised TSD to the front of the original TSD. An application for a Part 70 permit (T113-6491-00004) for the existing source was received on August 30, 1996 and is currently being reviewed by IDEM.

#### State Rule Applicability - Individual Facilities

##### 326 IAC 9-1 (Carbon Monoxide Emission Limits)

Pursuant to 326 IAC 9-1-~~2~~, the two afterburners for CO control shall be in operation **and maintain a minimum temperature of one thousand three hundred (1,300) degrees Fahrenheit for a minimum retention time of three-tenths (0.3) second** and control emissions from the cupola at all times that the cupola is in operation and during startup of the cupola.

## Compliance Monitoring Requirements

### 326 IAC 2-7-6(1) (Temperature Monitoring)

The permittee shall record the operating temperature of the afterburners at least once per shift when the cupola is in operation. Unless operated under conditions for which the Preventative Maintenance Plan specifies otherwise, the afterburner temperatures shall be maintained at a minimum of ~~1400~~ **1300** degrees F **for a minimum retention time of three-tenths (0.3) second.** ~~or a minimum temperature established during the latest stack test.~~ The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the temperature is below the above mentioned minimum for any one reading.

## Conclusion

The construction and operation of the two (2) afterburners shall be subject to the conditions of the attached proposed **Exemption 113-15818-00004.**